



1003498

INDEX OF DOCUMENTS FOR  
E.I. DU PONT DENEMOURS & COMPANY  
IND 005 174 354

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	12-15-95	A handwritten list of EPA and IDEM individuals involved with the facility.
000-EIDD	11-30-95	Handwritten meeting notes.
000-EIDD	11-13-95	Handwritten meeting notes.
000-EIDD	08-08-95	Draft Attachment I Sediment Characterization Analysis Project.
000-EIDD	04-19-95	U.S. EPA intra-office mail message from Rodger Field to several individuals, regarding a Du Pont meeting.
000-EIDD	03-06-95	Draft USX RCRA Corrective Action Order.
000-EIDD	08-12-94	Letter from USEPA to Coppola of Du Pont regarding § 3008 corrective action AOC.
000-EIDD	07-28-94	Attendee list for Du Pont meeting.
000-EIDD	06-29-94	U.S. EPA intra-office memo from Barbara Mazur to Thad Slaughter, regarding Eco-assessment guidance document.
000-EIDD	06-03-94	U.S. EPA intra-office mail message from Joseph Malek to Rodger Field, regarding E.I. Du Pont.
000-EIDD	05-27-94	Attendee list for meeting.
000-EIDD	05-16-94	Draft marked copy of IDEM in-house memorandum from Rick Roudebush to 1B1, regarding a pre-inspection files audit for E.I. Du Pont DeNemours.
000-E IDD	05-06-94	Copy of IDEM in-house memorandum from Ashley Insco to File 2D1, regarding "On-Site Disposal Facility at E.I. Du Pont Company.
000-EIDD	05-04-94	Copy of letter from U.S. EPA to Steven Coppola of Du Pont Legal Department, confirming a meeting scheduled for May 27, 1994.

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-E IDD	04-13-94	Confidential marked, faxed copy of IDEM in-house memorandum from Mark Schwoegler to Debbie Dubanatzky, regarding "E.I Du Pont DeNemours & Company, Inc.. (attachments)
000-E IDD	04-10-94	Faxed copy of IDEM in-house memorandum from John Hale to Kathryn Watson, regarding "Status-E.I Du Pont DeNemours, East Chicago-Solid Waste. (attachments)
000-E IDD	03-09-94	FOIA Exempt marked, faxed copy of IDEM in-house memorandum from Bruce Kizer to IDEM NW Compliance and Enforcement Committee, regarding "Briefing on E.I. Du Pont for the EPA/IDEM Compliance and Enforcement Committee".
000-E IDD	03-07-94	Confidential marked, faxed copy of memorandum from R. Molini to R. Moran, regarding background information on facility.
000-EIDD	01-19-94	U.S. EPA intra-office mail message from Rodger Field to Mike Mikulka, regarding Du Pont.
000-EIDD	09-17-93	Letter from Du Pont to Thad Slaughter of U.S. EPA, regarding "Du Pont/East Chicago RCRA §3007 Information Request." (multi-page document; attachments)
000-EIDD	01-28-93	Letter from Du Pont to Joseph Malek of U.S. EPA, regarding "Supplemental § 104(e) CERCLA Information Request, Du Pont East Chicago Indianan Plant." (attachments)
000-EIDD	01-06-93	Letter from Du Pont to Rodger Field of EPA, regarding "Supplemental § 104(e) CERCLA Information Request, Du Pont East Chicago IN Plant." (attachments)
000-EIDD	11-09-92	Copy of EPA in-house memorandum from Paul Johnson to Bill Tong, regarding "Potential impacts on sediments from contaminated ground water discharging to the Grand Calumet River, E.I. Du Pont site, East Chicago, Indiana." (attachments)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	11-09-92	Handwritten notes on copy of EPA in-house memorandum from Paul Johnson to Bill Tong, regarding "Potential impacts on sediments from contaminated ground water discharging to the Grand Calumet River, E.I. Du Pont site, East Chicago, Indiana." (attachments)
000-EIDD	11-06-92	Copy of letter from Du Pont to Robert Tolpa of U.S. EPA, regarding a Du Pont contact listing. (list attached)
000-EIDD	11-05-92	Copy of EPA in-house memorandum from Bill Tong to Rodger Field, regarding "Summary of October 26, 1992 teleconference with Du Pont."
000-EIDD	10-29-92	Letter from Du Pont to Rodger Field of EPA, regarding "Du Pont Request for Extension of Time, Supplemental CERCLA §104(e) Request for Information, (10/1/92), Du Pont East Chicago Plant." (attachment)
000-EIDD	10-02-92	"PRPDBASE, ACS Site, (Letter Tracking Report #2), Listing of All Letters With PRP Codes Translated". (attachment)
000-EIDD	10-01-92	Letter from U.S. EPA to E.F. Hartstein of E.I. Du Pont, regarding "Request for Supplemental Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for the E.I. Du Pont Site in East Chicago, Indiana hereinafter referred to as "the site." (attachments)
000-EIDD	10-21-92	Copy of EPA in-house memorandum from Bill Tong to Rodger Field, regarding "Summary of October 16, 1992 Meeting: Du Pont Multi-Media Work Group."
000-EIDD	09-30-92	In-house EPA memorandum from Robert Tolpa to Vacys Saulys, regarding "Du Pont Meeting."
000-EIDD	09-17-92	In-house EPA memorandum from Vacys Saulys to Robert Tolpa, regarding "Status of Du Pont's CERCLA Section 104 Information Request."

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	09-04-92	In-house EPA memorandum from Robert Tolpa to James Novak and Joseph Malek, regarding "Meeting with Du Pont Corporation's East Chicago Facility to discuss Sediment Remediation on the Grand Calumet River." (attachment letter not dated to E.F. Hartstein; multi-page document)
000-EIDD	06-22-92	Letter from Du Pont to Robert Topla of U.S. EPA, regarding "Summary of March 17, 1992, Meeting and Discussions Relative to the Du Pont East Chicago Plant Groundwater Investigation and Remediation Program." (attachments)
000-EIDD	06-14-92	Enforcement confidential marked "Case Development Work Plan" for the Du Pont facility. (multi-page document)
000-EIDD	05-22-92	Enforcement Sensitive/Attorney-Client Privilege marked in-house EPA memorandum from Bill Tong to Steve Mendoza and Joe Malek, regarding "Information Request for E.I. Du Pont."
000-EIDD	05-08-92	In-house EPA memorandum from Joseph Malek to many addressees, regarding "Du Pont meeting."
000-EIDD	05-07-92	Enforcement Sensitive/Attorney-Client Privilege marked in-house EPA memorandum from Bill Tong to Steve Mendoza, regarding "Information Request for E.I. Du Pont." (attachments)
000-EIDD	05-02-92	Enforcement Sensitive/Attorney-Client Privilege marked EPA in-house memorandum from Bill Tong to Steve Mendoza, regarding "Information request for E.I. Du Pont." (attachments)
000-EIDD	04-21-92	Letter from U.S. EPA to E.F. Hartstein of E.I. Du Pont, regarding "Section 308 (Clean Water Act), Information Request, E.I. Du Pont de Nemours & Co., Inc., NPDES Permit No. IN0000329, Docket No. V-W-91-308-11."

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	04-16-92	Copy of a EPA in-house memorandum from Vacys Saulys to Distribution, regarding Northwest Indiana Coordination Meetings.
000-EIDD	04-15-92	Copy of a EPA in-house memorandum from Michael Mikulka to Michael Smith, regarding Summary of Meeting held April 14, 1992 on Du Pont. (attachments)
000-EIDD	04-14-92	Handwritten meeting notes.
000-EIDD	04-08-92	EPA in-house memorandum from Joseph Malek to several individuals, regarding a Du Pont meeting.
000-EIDD	04-06-92	EPA in-house memorandum from Jonathan Barney to Bill Tong, regarding the chemical production at the Du Pont facility. (attachments)
000-EIDD	04-03-92	Handwritten notes on a telephone conversation with Dan Sparks. (attachments)
000-EIDD	03-31-92	EPA in-house memorandum from Bill Tong to Jim Filippini, regarding "Recommendations for sediment sampling for E.I. Du Pont." (attachments)
000-EIDD	03-25-92	EPA in-house memorandum from Bill Tong to Jim Novak, regarding the "Comparison of E.I. Du Pont groundwater seep data, groundwater well data, and USX Grand Calumet River sediment data." (attachments)
000-EIDD	03-24-92	EPA in-house memorandum from Joseph Malek to Thad Slaughter, regarding a meeting at the Du Pont facility. (attachments)
000-EIDD	03-23-92	EPA in-house memorandum from Bill Tong to Jim Filippini, regarding the "Correlation of USX Grand Calumet River sediment data for Du Pont Chemical/Harbison-Walker Refractories." (attachment)
000-EIDD	03-22-92	Letter from EPA to John Castilano of Harbison Walker Refractories, regarding the compliance with a information request. (attachment)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	03-19-92	EPA in-house memorandum from Bill Tong to many individuals, regarding "Meeting of March 17, 1992 at E.I. Du Pont." (attachment)
000-EIDD	03-18-92	EPA in-house memorandum from Jim Novak to many individuals, regarding "Du Pont Multi-media Coordination on East Chicago Plant Following March 17, 1992, Meeting at Du Pont." (attachments)
000-EIDD	03-17-92	EPA in-house memorandum from Joseph Malek to many individuals, regarding "E.I. Du Pont Self-Remediation Plan Meeting." (attachment)
000-EIDD	03-17-92	"Agenda Du Pont East Chicago, Meeting with U.S. EPA/IDEM, March 17, 1992". (multi-page document; attachments)
000-EIDD	03-17-92	EPA in-house memorandum from Joseph Thomas to David Dabertin, regarding "Du Pont Briefing on Groundwater Phase II Study and Phase III & IV Plans."
000-EIDD	12-16-91	IEPA in-house memorandum from John Naddy to File, regarding review of site inspection.
000-EIDD	12-10-91	Letter from U.S. EPA to Norman Griffiths of E.I. Du Pont, regarding "Du Pont's Section 104(e) Response."
000-EIDD	12-10-91	EPA in-house memorandum from Joseph Malek to many individuals, regarding "E.I. Du Pont 104(e) Response." (attachments)
000-EIDD	12-05-91	EPA in-house memorandum from Bert Frey to Todd Cayer, regarding "Office of Regional Counsel (ORC) Support for Superfund Enforcement and Du Pont."
000-EIDD	11-22-91	Letter from Du Pont to Joseph Malek of U.S. EPA, regarding responses to a 3007 information request dated September 20, 1991. (attachments)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	10-25-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmission of the September Monthly monitoring report. (attachment)
000-EIDD	10-24-91	Letter from Ecology and Environment, Inc. to Colleen Hart of U.S. EPA, regarding a field investigation conducted on site at the facility. (attachment)
000-EIDD	09-27-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmission of the August Monthly monitoring report. (attachment)
000-EIDD	09-23-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding "Du Pont Response to June 27, 1991 Ltr. DSB to NDG Second §308 Information Request - East Chicago Plant". (attachment)
000-EIDD	09-13-91	"Incident Report East Chicago Plant"
000-EIDD	09-13-91	Draft copy of a letter from U.S. EPA to E.F. Hartstein of E.I. Du Pont, regarding "Request for Information Pursuant to § 104(e) of CERCLA and § 3007 of RCRA, for E.I. Du Pont de Nemours and Co., Inc." (attachment)
000-EIDD	09-05-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmission of the July Monthly monitoring report. (attachment)
000-EIDD	09-03-91	"Reference Documentation Sheet" (multi-page document; attachments)
000-EIDD	08-31-91	Letter from C&M Hill to O.J. Meyer of Du Pont, regarding the transmission of a Phase II Groundwater Assessment Report. (attachment)
000-EIDD	08-23-91	Letter from DuPont to Dale Bryson of EPA, regarding "Du Pont Response to June 27, 1991 Ltr. DSB to NDG Second §308 Information Request - East Chicago Plant".
000-EIDD	08-07-91	"Incident Report East Chicago Plant"

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	08-00-91	"Phase II Groundwater Assessment" (volumes I & II)
000-EIDD	07-31-91	Handwritten transmission letter from U.S. EPA to E.F. Hartstein of E.I. Du Pont, regarding a telephone conversation.
000-EIDD	07-21-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmission of the June, 1991 Monthly monitoring report. (attachment)
000-EIDD	07-12-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding receipt of letter from Du Pont dated June 27, 1991. (attachments)
000-EIDD	06-27-91	Draft copy of letter from U.S. EPA to Norman D. Griffiths of E.I. Du Pont, regarding "Section 308 (Clean Water Act), Information Request, E.I. Du Pont de Nemours & Co., Inc., NPDES Permit No. IN0000329, Docket No. V-W-91-308-11."
000-EIDD	06-13-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmittal of the May Monitoring Report. (attachments)
000-EIDD	06-12-91	Transmittal sheets from CHM2 Hill regarding monthly status reports.
000-EIDD	06-04-91	Letter from Du Pont to Jim Novak of U.S. EPA, regarding the transmission of a modified §308 information request. (attachment)
000-EIDD	05-14-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the transmittal of the April Monitoring Report. (attachments)
000-EIDD	04-30-91	EPA in-house memorandum from James Novak to File, regarding "Du Pont, East Chicago, Indiana - Summary of Conversation".
000-EIDD	04-16-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the "Submission of One-Time, Monthly Monitoring Rpts, Du Pont East Chicago Plant - §308 Request." (attachment)



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000-EIDD	04-10-91	EPA in-house memorandum from Joe Malek to various individuals, regarding "Mulit-media data collection at the E.I. DuPont facility, facility, East Chicago, Indiana".
000-EIDD	04-08-91	Memo from Pixie Newman and Roger Huddleston of CH2M Hill to Richard Nelson, and Jackie Strecker of IDEM and Bob topia of EPA, regarding "Phase II Groundwater Assessment Status Report January 21, 1991 - February 20, 1991.
000-EIDD	03-29-91	EPA in-house memorandum from Basim Dihy to Michael Mikulka, regarding "Legal Support Sampling Inspection (LSI) - E.I. Du Pont De Nemours and Company, Inc., East Chicago, Indiana." (attachments)
000-EIDD	03-26-91	Letter from Du Pont to Joseph Malek of U.S. EPA, regarding the "DuPont East Chicago Plant." (attachment)
000-EIDD	03-26-91	EPA enforcement confidential labeled in-house memorandum, from Joe Malek to addressee, regarding a discussion group scheduled for April 3, 1991.
000-EIDD	03-21-91	Handwritten transmission of a fax from Jim Novak of U.S. EPA to O.J. Meyer of E.I. Du Pont, regarding a telephone conversation.
000-EIDD	03-20-91	Handwritten letter from Jim Novak of U.S. EPA to O.J. Meyer of E.I. Du Pont, regarding a telephone conversation.
000-EIDD	03-18-91	Draft copy of letter from U.S. EPA to Norman D. Griffiths of E.I. Du Pont, regarding "Section 308 (Clean Water Act), Information Request, E.I. Du Pont de Nemours & Co., Inc., NPDES Permit No. IN0000329, Docket No. V-W-91-308-11."
000-EIDD	03-18-91	EPA in-house memorandum from Jim Novak to File, regarding "E.I. DuPont - Coordinated Action".

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000-EIDD	03-14-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the receipt of a Information Request (§308 Clean Water Act) on February 15, 1991." (multi-page document; attachment)
000-EIDD	03-14-91	EPA in-house memorandum from Jim Novak to file, regarding status of outfall sample analysis.
000-EIDD	03-11-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding "Extension of Time to Reply to §308 Clean Water Act Request".
000-EIDD	03-11-91	Telephone conversation record of a call between James Filipinni of U.S EPA and E.F. Hartstein of E.I Du Pont, regarding "308 Request".
000-EIDD	02-21-91	Letter from Du Pont to Dale Bryson of U.S. EPA, regarding the receipt of a information request.
000-EIDD	02-15-91	EPA in-house memorandum from Jim Novak to file, regarding "E.I. Du Pont, East Chicago - Phone Memo on 308".
000-EIDD	02-13-91	Copy of letter from U.S. EPA to E.F. Hartstein of E.I. Du Pont, regarding "Section 308 (Clean Water Act), Information Request, E.I. Du Pont de Nemours & Co., Inc., NPDES Permit No. IN0000329, Docket No. V-W-91-308-11." (attachment)
000-EIDD	02-05-91	Letter from Du Pont to Jim Novak of U.S. EPA, regarding "Site Groundwater Analysis." (attachments)
000-EIDD	12-11-90	Informational letter from Du Pont. (attachments)
000-EIDD	10-26-90	Memo from Norm Bell to O.J. Meyer, regarding Landfill filter caking on the East Chicago, IN site.
000-EIDD	09-20-90	"Fiscal Year 1990, Geographic Enforcement Initiative, Clean Water Act, Administrative Orders, Lake & Porter Counties in Indiana." (multi-page document)

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000-EIDD	09-11-90	Letter from Du Pont to Jo Lynn Traub of U.S. EPA, regarding "Your letter dated August 31, 1990 requesting information relative to releases in the vicinity of the Grand Calumet River."
000-EIDD	08-07-90	EPA in-house memorandum from Beth Henning to All Attorneys, regarding "Grand Calumet River/Indiana Harbor Information Requests".
000-EIDD	08-00-90	"Section V - Emergency Response Plan" (multi-page document)
000-EIDD	03-14-90	"Letter from DuPont to Robert Topla of U.S. EPA, regarding a public meeting scheduled for 3/28/90. (attachments)
000-EIDD	02-22-90	Letter from C&M Hill to O.J. Meyer of Du Pont, regarding the transmission of a Phase I Groundwater Assessment Report.
000-EIDD	01-02-90	"East Chicago Organization" organizational chart of the plant located in East Chicago, Indiana. (attachments)
000-EIDD	00-00-90	"DuPont Annual Report 1990" (booklet)
000-EIDD	11-14-89	"East Chicago Indiana Unusual Incident" (attachment)
000-EIDD	01-25-88	"Draft Northwest Indiana Environmental Action Plan"
000-EIDD	08-03-87	"U.S. Environmental Protection Agency, Office of Emergency and Remedial Response, CERCLIS V1.2, M.2 - Site Maintenance Form" (multi-page document)
000-EIDD	04-23-87	IEPA in-house memorandum from Devassy Kootungal to Steve Reuter, regarding the review of sludge analysis data.
000-EIDD	03-27-87	"CERCLIS EXECUTIVE SUMMARY"
000-EIDD	12/3-5/86	Meeting Notes (multi-page document)
000-EIDD	11/5-7/86	Meeting Notes (multi-page document)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	08-16-86	Memorandum generated by Ecology & Environment, Inc. from Cynthia Bachunas to Ellen Jurczak, regarding the review of the results of the reanalysis for the Du Pont site. (attachments)
000-EIDD	05-28-86	Letter from Du Pont to the Division of Land Pollution Control-Manifest, Indianan State Board of Health, regarding the transmission of copies of manifest documents. (attachments)
000-EIDD	03-31-86	Letter from the State of Indiana, State Board of Health to Jerry Meyer of E.I. Du Pont, regarding "Evaluation of Waste Solids".
000-EIDD	01-13-86	Handwritten memorandum from O.J. Meyer to WM Conner, regarding analysis of solids tested on 12/27/85.
000-EIDD	10-15-85	Letter from Du Pont to George Oliver of the Indiana State Board of Health, regarding NPDES sludge, products of plant, and landfill sludge. (attachment)
000-EIDD	05-29-85	Letter from the Indiana Environmental Management Board to Donald Ehmen of the Indiana Waste System, Inc., regarding "Disposal of Asbestos Pipe Insulation from E.I. Du Pont De Nemours and Company, East Chicago."
000-EIDD	04-01-85	"State of Indiana, Stream Pollution Control Board, SPC-17 Liquid Waste Removal Record, Industry Report." (attachments)
000-EIDD	03-29-85	Letter from IPEA to S.M. Birkel of E.I. Du Pont, regarding "NPDES Permit No. IN0000329, E.I. Du Pont De Nemours & Company, East Chicago Plant." (attachments)
000-EIDD	10-29-84	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	06-07-84	Letter from Indiana Environmental Management Board to Donald Ehmen of Indiana Waste Systems, Inc., regarding "Waste Disposal Approval Extension for Abestos Pipe and Tank Insulation from Du Pont, East Chicago."
000-EIDD	00-00-84	Two maps "Location of Point source Discharges", and "Preliminary Information; Draft".
000-EIDD	08-23-83	Meeting attendee list
000-EIDD	08-16-83	Letter from Ecology and Environment, Inc. to Steve Birkel of E.I. Du Pont, regarding the transmittal of analytical data. (multi-page document; attachments)
000-EIDD	11-30-82	Letter from DuPont to Karen Evans of Resource Recovery & Planning Section, Division of Land Pollution Control, regarding "CERCLA Hazardous Ranking system - DuPont East Chicago Plant".
000-EIDD	11-24-82	Letter from Ecology and Environment, Inc. to Steve Birkel of E.I. Du Pont, regarding the protocol followed when preserving serving samples and the transmittal of analytical data. (attachments)
000-EIDD	09-08-82	Letter from Dupont to U.S. EPA, regarding groundwater testing at the East Chicago Plant. (attachments)
000-EIDD	08-20-82	Letter from Ecology and Environment, Inc. to J.t. Sixsmith of DuPont, regarding a letter dated July 13, 1982.
000-EIDD	07-27-82	"HRS Cover Sheet" (report attached)
000-EIDD	07-15-82	Letter from IDEM to E.I. Du Pont De Nemours and Company, regarding "Monitoring Wells". (attachment)
000-EIDD	07-13-82	Letter from DuPont to Ellen Jurczak of Ecology and Environment, Inc., regarding the installation of four groundwater monitoring wells.

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000-EIDD	06-28-82	"Documentation Records for Hazard Ranking System" form. (multi-page document)
000-EIDD	06-07-82	Letter from Ecology and Environment, Inc. to John Sixsmith of E.I. Du Pont, regarding the installation of a groundwater monitoring well at the facility. (attachments)
000-EIDD	02-09-82	Handwritten notes regarding "waste acid in tanks".
000-EIDD	12-14-81	EPA in-house memorandum from William Muno to File, regarding "Final Determination - E.I. Du Pont, East Chicago, Indiana." (multi-page document)
000-EIDD	11-03-81	EPA in-house memorandum from Ron Lillich to William Miner, regarding "Sediment Sampling Survey on the Grand Calumet River near E.I. Du Pont in East Chicago, Indiana". (attachments)
000-EIDD	07-19-81	EPA in-house memorandum from John Connell to William Muno, regarding "Sediment Sampling - Grand Calumet River, East Chicago, Indiana."
000-EIDD	07-07-81	File copy of a EPA in-house memorandum from William Muno to John Connell, regarding "Sediment Sampling - Grand Calumet River, East Chicago, Indiana."
000-EIDD	04-30-81	EPA in-house memorandum from W.H. Miner to Phyllis Reed, regarding "Sediment Sampling - Grand Calumet River, East Chicago, Indiana."
000-EIDD	02-13-81	"Hazardous Waste Referral" form. (multi-page document)
000-EIDD	01-22-81	Letter from Du Pont to W.E. Muno of U.S. EPA, regarding submitted information per a 308 information request.
000-EIDD	01-14-81	EPA in-house memorandum from Dale Bryson to addresses, regarding "Reporting the Status of the Northwest Indiana Action Plan." (multi-page document)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	12-16-80	In-house memorandum from Ecology and Environment to File, regarding "Indiana/TDD #F5-8012-1, East Chicago/E.I. DuPont DeNemours and Company." (attachments)
000-EIDD	11-12-80	Telephone Conversation Record between Wm.E. Muno of U.S. EPA and File, regarding a plant inspection and meeting at the DuPont plant. (attachments)
000-EIDD	10-10-80	Telephone Conversation Record between Wm.E. Muno of U.S. EPA and J.T. Sixsmith of E.I. DuPont, regarding a meeting at the DuPont plant.
000-EIDD	09-29-80	Telephone Conversation Record between Wm.E. Muno of U.S. EPA and J.T. Sixsmith of E.I. DuPont, regarding "reply to EPA's 8/28/80, letter on groundwater monitoring etc."
000-EIDD	09-29-80	Draft copy of a letter from U.S. EPA to J.T. Sixsmith of E.I. DuPont, regarding reply to information request. (attachment)
000-EIDD	08-28-80	Draft letter from EPA to J.T. Sixsmith of DuPont, regarding the review of an information request.
000-EIDD	07-18-80	"Potential Hazardous Waste Site Identification and Preliminary Assessment". (multi-page document)
000-EIDD	07-02-80	EPA in-house memorandum from Richard Shandross and Davis Homer to Jarry Frumm, regarding "Evaluation of 308 Response from DuPont, East Chicago, Indiana." (attachments)
000-EIDD	06-30-80	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."
000-EIDD	06-25-80	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	04-30-80	"Potential Hazardous Waste Site, Identification and Preliminary Assessment" (multi-page document)
000-EIDD	04-30-80	Letter from Du Pont to Sandra Gardebring of U.S. EPA, regarding "Information Request, E.I. Du Pont De Nemours & Company, East Chicago, Indiana." (multi-page document; attachments)
000-EIDD	04-29-80	Letter from Du Pont to Sandra Gardebring of EPA, regarding "Information Request E.I. DuPont de Nemours & Company East Chicago, Indiana". (attachments)
000-EIDD	03-14-80	"Potential Hazardous Waste Site, Tentative Disposition"
000-EIDD	02-06-80	Form from National Spectrographic Laboratories, Inc., to Du Pont, regarding Filter Sludge 1/10/80. (attachment)
000-EIDD	12-14-79	Handwritten note from Sixsmith to R.Cott, regarding previous telephone conversation.
000-EIDD	12-03-79	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."
000-EIDD	11-16-79	Form from National Spectrographic Laboratories, Inc., to Du Pont, regarding Filter Sludge (Environmental Precoat Filter). (attachment)
000-EIDD	11-01-79	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."
000-EIDD	08-09-79	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."
000-EIDD	05-11-79	Letter from Du Pont to the Program Support Branch of the Water Pollution control Division, regarding "NPDES Permit No. IN0000329."



<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	12-00-78	"Attachment I, Soil Investigation, DuPont Property, East Chicago, Indiana, December 1978.
000-EIDD	11-18-77	Letter from Indiana Stream Pollution control Board to Wayne Slager of Calumet Waste Systems, regarding "disposal of Herbicide from Du Pont, Incorporated".
000-EIDD	01-07-77	Letter from Du Pont to T.J. Linton of the Experimental Station in Willington, regarding "East Chicago solid Waste". (attachments)
000-EIDD	09-08-76	Dupont in-house memo from T.J. Valenti to W. Laud, regarding "Solid Waste Disposal". (attachments)
000-EIDD	08-31-76	Memorandum from J.T. Sixsmith to P. Gilby, regarding an incident that occurred on August 25, 1976.
000-EIDD	03-26-76	Du Pont in-house memorandum regarding the transmission of the NPDES Permit.
000-EIDD	09-18-73	Letter from Indiana Stream and Control Board to J.T. Sixsmith, regarding "Waste water Treatment". (multi-page document)
000-EIDD	09-13-73	Letter from Indiana State Board of Health to J.T. Sixsmith, regarding "NPDES Permit, E.I. Du Pont DeNemours and Company, Application No. IN 070 OX3 2 720889".
000-EIDD	08-21-73	Letter from U.S. EPA to Oral Hert, regarding NPDES draft permit.
000-EIDD	08-13-73	Du Pont in-house memorandum from J.T. Sixsmith to R.C. Ott, regarding "Water Pollution Abatement Facilities - Indiana Final Approval".
000-EIDD	07-20-73	Letter from Du Pont to Oral Hert of Stream Pollution Control Board, regarding final approval of an application submitted to the Stream Pollution Control Board. (multi-page document; attachments)
000-EIDD	06-29-73	Letter from Indiana Stream Pollution Control Board to Department of the Army, Chicago District Corps of Engineers, regarding "Dredging Grand Calumet River by

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
		E.I. Du Pont, East Chicago, Indiana".(attachment)
000-EIDD	04-06-73	"Water Well Record" (multi-page document)
000-EIDD	07-28-72	Letter from Du Pont to Dennis Karas of the Department of Air Quality Control, city Hall, regarding the granting of a open burning permit. (attachments)
000-EIDD	11-06-62	Document generated by Du Pont, stamped "Manual of Technology", to R.D. Gotwals. regarding "ORCHEM Dept. - East Chicago - Project 9499 Waste - Approval for HCl Discharge."
000-EIDD	01-02-57	Letter from the Stream Pollution Control Board, stamped "Manual of Technology", to E.I. Du Pont, regarding "Grasselli, East Chicago Sulfuric Waste Treatment and Disposal." (attachments)
000-EIDD	00-00-00	Handwritten meeting notes. (meeting on March 16, 1991 (?))
000-EIDD	00-00-00	Memorandum from Jim Novak of U.S. EPA to Du Pont Multi-Media Work Group, regarding "Meeting on Du Pont case".
000-EIDD	00-00-00	Faxed copy of Draft Notice of Violation and Draft Agreed Order. (multi-paged document)
000-EIDD	00-00-00	FOIA Exempt marked, faxed copy of memorandum from Cody Fleece to Kathy Watson, Mark Stanifer, John Hale, Rosemary Cantwell, Dave Dubenetzky, Bruce Kizer, Gary Starks, Don Kuh, Mark Schwoegler, and Dave Dabertin, regarding "This is item #4 for Kathy Watson's March 15, 2994 memo.
000-EIDD	00-00-00	Copy of a signed Tolling Agreement.
000-EIDD	00-00-00	Copy of a "Table No. 22, Sediment Volume Calculations".
000-EIDD	00-00-00	RFI/CM Study (Consent or Unilateral).
000-EIDD	00-00-00	Draft Clean Water Act.
000-EIDD	00-00-00	Case Development Plan (Working Draft).

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	00-00-00	Document titled "Overview of the Ecological Risk Assessment Process". (multi-page document)
000-EIDD	00-00-00	Eight charts on GCR sediments.
000-EIDD	00-00-00	Eight charts on GCR sediments.
000-EIDD	00-00-00	Six charts on Grand Calumet River, sediment levels.
000-EIDD	00-00-00	Seven charts on Grand Calumet River, sediment levels.
000-EIDD	00-00-00	Agenda for meeting scheduled for October 16, 1992.
000-EIDD	00-00-00	Draft copy of a partial information request.
000-EIDD	00-00-00	Document titled "Accounts Payable." (attachments)
000-EIDD	00-00-00	Copy of the issued hazardous waste permit application.
000-EIDD	00-00-00	Multi-dated notes. (multi-page document)
000-EIDD	00-00-00	Untitled guidance on the handling of hazardous waste.
000-EIDD	00-00-00	Handwritten note from Jim F. to Jim N., regarding a telephone conversation.
000-EIDD	00-00-00	EPA in-house memorandum from Rodger Field to the "DuPonters", regarding "Du Pont Information Request". (attachment)
000-EIDD	00-00-00	Handwritten notes no title and hard to read writing.
000-EIDD	00-00-00	Page of a inspection report.
000-EIDD	00-00-00	Two Water Well Logs.
000-EIDD	00-00-00	"Water Well Record"
000-EIDD	00-00-00	"RCRA INSPECTION REPORT-INTERIM STATUS STANDARDS, TREATMENT, STORAGE, AND DISPOSAL FACILITIES, Form 1 General Facility Standards." (multi-page document)

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	00-00-00	"Test Bring Log", has a yellow sticky tab labeled soil.
000-EIDD	00-00-00	"Water Well Log", had a yellow sticky tab labeled GW.
000-EIDD	00-00-00	Memorandum to Bill Muno, regarding "DuPont Chemical Plant". (attachments)
000-EIDD	00-00-00	"Potential Hazardous Waste Site Log"
000-EIDD	00-00-00	"Office of Solid and Hazardous Waste Management, Special Waste Disposal Approval", signed on April 5, 1991. (attachments)
000-EIDD	00-00-00	"Office of Solid and Hazardous Waste Management, Special Waste Disposal Approval", signed on November 30, 1989.
000-EIDD	00-00-00	State of Indiana Form E. signed on February 23, 1988. (attachments)
000-EIDD	00-00-00	EPA form "Notification of Hazardous Waste Site". (attachments)
000-EIDD	00-00-00	State form "Hazardous Waste Work Sheet" on 3/4/81 review of request from facility. (attachments)
000-EIDD	00-00-00	Guidance titled Weed and Brush Killers.
000-EIDD	00-00-00	State form "Hazardous Waste Work Sheet" on 11/7/77 Telephone call.
000-EIDD	00-00-00	State form "Hazardous Waste Work Sheet" (this Plant Process Heavy Chemicals).
000-EIDD	00-00-00	"SCOPE OF WORK, ?????? OF SOLID WASTES OFF THE EAST CHICAGO PLANT". (attachment)
000-EIDD	00-00-00	Two news paper articles, "Du Pont to Stop Emissions of a Gas", and "Giving the Environment Teeth".
000-EIDD	00-00-00	Document labeled EI DuPont Comments"
000-EIDD	00-00-00	File copy of letter from U.S. EPA to O.J. Meyer, regarding correspondence dated September 11, 1990.

INDEX OF DOCUMENTS  
PROVIDED BY  
E.I. DU PONT DENEMOURS & COMPANY  
IND 005 174 354  
PER A SECTION 104(E)  
INFORMATION REQUEST

The following documents are all relating to a Section 104(e) Information Request issued by U.S. EPA to Du Pont on February 15, 1991.

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	12-10-91	Letter from U.S. EPA to Norman Griffiths of E.I. DuPont, regarding "DuPont's Section 104(e) Response."
000-EIDD	12-10-91	EPA in-house memorandum from Joseph Malek to various individuals, regarding "E.I. DuPont 104(e) Response."
000-EIDD	11-22-91	Letter from Du Pont to Joseph Malek of U.S. EPA, regarding the transmittal of the facilities response to the 104(e). (attachment)
000-EIDD	10-15-91	Letter from DuPont to U.S. EPA, regarding "Request for Extension of Time - Du Pont Response, CERCLA §104(e) Request - Du Pont East Chicago Facility."
000-EIDD	03-26-91	Letter from DuPont to U.S. EPA, regarding "Du Pont East Chicago Plant."
000-EIDD	02-00-90	Attachment 2-1, CBI, File includes: a document titled "Groundwater Assessment, Phase I, East Chicago Plant, East Chicago, Indiana."
000-EIDD	00-00-00	"Chronology" of the events between DuPont, the State and EPA.
000-EIDD	00-00-00	Attachment 2-2, CBI, File
000-EIDD	00-00-00	Attachment 2-3, CBI, File includes: a faxed copy of a document labeled "East Chicago Plant R/M Suppliers". (multi-page document)
000-EIDD	00-00-00	Attachment 2-4, CBI, File

*12/10/91  
DuPont  
letter*

*to 12/10/91  
DuPont letter:*

*to 12/10/91  
DuPont letter:*

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	00-00-00	Attachment 3-1, CBI, File includes: a copy of the property map of the East Chicago Plant, East Chicago, Indiana. labeled "East Chicago Plant R/M Suppliers". (multi-page document)
000-EIDD	00-00-00	Attachment 3-2, CBI, File includes: copies of documents pertaining to the legal description of the property known as the East Chicago Plant, East Chicago, Indiana. (attachments)
000-EIDD	00-00-00	Attachment 7-1, CBI, File includes: copies of documents pertaining to plant process and discharge information at the property known as the East Chicago Plant, East Chicago, Indiana. (attachments)
000-EIDD	00-00-00	Attachment 7-2, CBI, File includes: copies of documents pertaining to the expiration of a NPDES permit for the property known as the East Chicago Plant, East Chicago, Indiana. (attachments)
000-EIDD	00-00-00	Attachment 7-3, CBI, File includes: copies of documents pertaining to the issuance of a new Industrial Wastewater Discharge Permit for the property known as the East Chicago Plant, East Chicago, Indiana. (attachments)
000-EIDD	00-00-00	Attachment 7-4, CBI, File includes: copies of documents pertaining to the standard permit conditions for the property known as the East Chicago Plant, East Chicago, Indiana. (attachments)
000-EIDD	00-00-00	Attachment 7-5, CBI, File includes: copies of a permit issued by the "City of East Chicago Indiana, Department of Air Quality Control, Operation Permit, Equipment/Process," for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 7-6, CBI, File includes: a copy of a "Receipt for Underground Storage Tank Registration," for the property known as the East Chicago Plant, East Chicago, Indiana.

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	00-00-00	Attachment 7-7 CBI, File includes: copies of documents pertaining to the "Water Pollution - Corps of Engineers Dredging Permit," for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 7-8 CBI, File includes: correspondence pertaining to the open burning permit for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 9-1 CBI, File includes: copies of process discharge information for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 9-2 CBI, File includes: copies of "Industrial Data Summary" report for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 9-3 CBI, File includes: a copy of the "1989 Data New Wastes" reprot for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 9-4 CBI, File includes: a copy of the "CSWIS/ Inventory Report" for 1989 data for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 9-5 CBI, File
000-EIDD	00-00-00	Attachment 9-6 CBI, File includes: a copy of the "Form B: Disposal Site Information" report for the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 13-1 CBI, File includes: a copy of the "Du Pont East Chicago, Indiana Production History", dated "29- Nov.-88 - Appendix B - Page 1", for the property known as the East Chicago Plant, East Chicago, Indiana.

<u>ID#</u>	<u>Date</u>	<u>Document &amp; Description</u>
000-EIDD	09-04-27	Attachment 14-1 CBI, File includes: a photograph of the facility on the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 14-2 CBI, File includes: photographs and map photographs of the facility on the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 14-3 CBI, File includes: a aerial photographs map of the facility on the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	08-00-91	Attachment 15-1 CBI, File includes: "Groundwater Assessment, Phase II, Volume I of II, and II of II East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 15-2 CBI, File includes: correspondence pertaining to the Section §308 Information Request (Clean Water Act), for the facility on the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	01-11-91	Attachment 15-3 CBI, File includes: correspondence pertaining to the wetlands issues at the facility on the property known as the East Chicago Plant, East Chicago, Indiana. (multi-page document)
000-EIDD	00-00-00	Attachment 15-4 CBI, File includes: correspondence pertaining to the vegetation damage surrounding the facility on the property known as the East Chicago Plant, East Chicago, Indiana.
000-EIDD	00-00-00	Attachment 15-5 CBI, File includes: correspondence pertaining to the Compliance Evaluation Inspection conducted at the facility on the property known as the East Chicago Plant, East Chicago, Indiana, on July 13, 1989.
000-EIDD	00-00-00	Attachment 15-6 CBI, File
000-EIDD	00-00-00	Attachment 17-1 CBI, File includes: "The Grand Calumet: Exploring the River's Potential".



ID#

000-EIDD

Date

07-15-90

Document & Description

Attachment 17-2 CBI, File includes:  
correspondence pertaining to preserving  
the native plants in the area surring the  
facility on the property known as the East  
Chicago Plant, East Chicago, Indiana.



## ORGANIZATION CHART - DU PONT CHEMICALS

NOVEMBER 1, 1990

Senior Vice President - Du Pont Chemicals - Robert v.d. Luft

Executive Assistant - Mary E. Travis

Continuous Improvement Managers - Robert W. Gerlach, Tod Kuchler

Director - Planning - Jerry McCleskey

Vice President and General Manager - "Freon" Products - Joseph P. Glas

Planning and Administrative Manager - Nicholas C. Fanandakis

Environmental Manager - F. Anthony Vogelsberg, Jr.

Business Manager - Domestic - A. Dwight Bedsole

Business Manager - International - Robert C. Kohn

National Sales Manager - "Freon" Products - H. Daniel James

Aerosols/Halon Sales Manager - Alfred P. Dougherty, Jr.

Blowing Agents Sales Manager - Fred J. Michels

Industrial Cleaning Manager - Barry L. Owens

Refrigerants Sales Manager - R. Michael Kitchens

Refrigerants Sales Manager - Daniel J. Lauritis

Production Manager - "Freon" Products - Charles G. Browne

Technical Manager - "Freon" Products - Philip L. Meredith

Financial Manager - "Freon" Products - G. Van Alles

M&L Manager - "Freon" Products - Robert H. Freedman

Vice President and General Manager - Industrial Chemicals - John C. Breckenridge

Administrative Manager / Business Manager - Silica Products - A. Jerome Edison

Business Manager - Acids, DMS and Methylamines - Richard A. Fenoglio

Business Manager - Aniline, Electrochemicals, Formaldehyde/Methanol - Robert Wiederhorn

Business Manager - Cyanides - Gerard J. Donnelly

Business Manager - DCV (Du Pont/ConAgra) & Related Ventures, HAA/Glycolide - Earnest W. Porta

Business Manager - Peroxygens - Joseph R. Westwood

Business Manager - Specialty Explosives - Thomas J. Enright

Director - Market Development - Pulp and Paper, Cleaning Products - Paul G. Linsen

Director - Technology - Harold B. Clark

General Sales Manager - Industrial Chemicals - Robert T. Harding

Regional Manager - Industrial Chemicals (East) - Ronald H. Mask

Regional Manager - Industrial Chemicals (Central) - Joseph R. Skurla

Regional Manager - Industrial Chemicals (Southwest) - Robert C. Surman

Marketing Manager - Mining/Industrial Chemicals (West) - Randy A. Hempel

National Distributor Manager - Edward V. Wandersee

National Sales Manager - Departmental Accounts - Edward W. Stewart

Production Manager - Industrial Chemicals - August T. Gentilucci

Technical Manager - Industrial Chemicals - William D. Hill

Financial Manager - Industrial Chemicals - Diana T. Smith

M&L Manager - Industrial Chemicals - Richard M. Smith

DUPONT 1928 - BOUGHT GRASSELLI CORP  
GRASSELLI CHEM

INORGANIC CHARACTER  
ACIDS & METAL SALTS

January 2, 1991

EAST CHICAGO ORGANIZATION

<u>PLANT MANAGER</u>	<u>E. F. Hartstein</u>
<u>AREA MANAGER - "LUDOX"/SILICATES</u>	<u>J. C. Chaney</u>
<u>AREA MANAGER - EVC/POWER/PROJECTS</u>	<u>W. W. Leoniy</u>
<u>AREA MANAGER - MECHANICAL, DISMANTLEMENTS, SH&amp;E</u>	<u>O. J. Meyer</u>
<u>SUPERVISOR MECHANICAL</u>	<u>A. J. Horvat</u>
<u>AREA MANAGER - SERVICES</u>	<u>P. M. Winkley</u>
<u>R&amp;D CHEMIST</u>	<u>J. N. Orban**</u>

Exempt

Non-Exempt

Wage

6\*\*

7

38

\*\* On R&D Rolls

Vice President - Manufacturing - Chemicals - Paul Z. Larson  
Manufacturing Managers - John C. Day, Maurice R. Richard  
Manufacturing Resources Manager - David F. Gilbert  
Regional Manufacturing Services Manager - Daniel J. Logan  
Continuous Improvement Manager - Tod Kuchler  
Engineering Manager - Robert A. Shinn \*\*  
Facilities Manager - James B. Porter, Jr. \*\*  
Manager - Departmental Maintenance Office - William R. VanHoy \*\*  
Production Manager - "Freon" Products - Charles G. Browne  
SHEA Manager - Carolyn S. Seringer  
Manufacturing Manager - Maurice Astorga  
Corpus Christi - Manager - Waverly D. McCluskey  
Louisville - Plant Superintendent - Richard A. Crane  
Montague - Manager - Evelyn L. Williams  
Production Manager - Industrial Chemicals - August T. Gentilucci  
SHEA Manager - Norman Bell  
Beaumont - Unit Manager - Richard F. Dubnansky  
Burnside - Manager - L. Lane Hash  
East Chicago - Manager - Eugene F. Hartstein  
Fort Hill - Manager - Peter E. Morgenthaler  
Grassell - Manager - Stephen M. Birkel  
Healing Springs - Manager - Cliff A. Cremeans  
James River - Manager - John R. Wasilik  
Memphis - Manager - Robert W. Porter  
Pompton Lakes Works - Manager - Leander E. Woods  
Potomac River Works - Manager - Hurley C. Gill  
Toledo - Manager - Wendell E. Kohl  
Wurtland - Manager - Brian D. Rains  
Belle - General Superintendent - Kenneth H. Cook  
Production Manager - Petrochemicals - Donald E. Heasley  
Engineering Planning Manager - Robert P. Goss  
SHEA Manager - H. Dale Martin  
Beaumont - Petrochemicals Operations - Pat J. McParland  
Old Hickory Plant Manager / Cape Fear - Petrochemicals Operations - Harold L. Dev  
Pontchartrain - Petrochemicals Operations - James H. Bennett  
Sabine River - Plant Manager - James V. Woodrick  
Victoria - Plant Manager - Thomas G. Springer  
Manufacturing Managers - Ignac R. Matocha, Hank T. Betts  
New Business Manufacturing Manager - William J. Faassen  
European Petrochemicals Operations - Francois Gauthier \*  
Production Manager - Specialty Chemicals - Daniel W. Burger, Jr.  
SHEA Manager - Alan B. Palmer  
European THF Plant Project Team Leader - Anthony V. Scancella  
Chambers Works/Repauno - Manager - Richard D. Stewart  
Niagara - Manager - Gerald R. Ehrman  
LaPorte - General Superintendent - John L. Progelhof  
Production Manager - White Pigment and Mineral Products - G. Emmett Lynskey  
Departmental Environmental Coordinator / SHEA Manager - Albert H. Schultz  
Antioch Works/Pomona - Manager - Ian H. Dunn  
DeLisle - Manager - Ronald B. Root  
Edge Moor - Manager - John F. Kane, Jr.  
Florida - Manager - Donald V. Luebke  
Johnsonville - Manager - Dwight O. Miller  
Korea - Plant Manager Designate - Martin L. Brown \*  
Taiwan - Plant Manager Designate - Richard S. Quinn \*

Vice President - Research & Development - Chemicals - C. Edward Lorenz

Administrative Manager - Norman E. Krauss  
Director - New Technology Studies - Herbert S. Eleuterio  
Technical Manager - "Freon" Products - Philip L. Meredith  
Technical Manager - Industrial Chemicals - William D. Hill  
Technical Manager - Petrochemicals - Randolph J. Guschl  
Technical Manager - Specialty Chemicals - Stanley S. Wreford  
Technical Manager - White Pigment and Mineral Products - A. Michael Doyle  
Technical Manager - Functional Technology Centers - Frank Knowles, Jr.  
Laboratory Director - Experimental Station - Louis C. Glasgow  
Laboratory Director - Jackson Laboratory - J. Peter Jesson  
Research Manager - Special Studies - Richard E. Bockrath

\* Subsidiary roll.  
 \*\* Engineering roll.

Vice President and General Manager - Petrochemicals - Paul V. Tebo

Planning Manager - Jeffrey F. Sheara  
Senior Manager - Business and Marketing Services - John W. Hammond  
Business Manager - Acrylonitrile, Olefins, Spec. Nylons - Patricia S. Murdock  
Business Manager - C12 Intermediates, Spec. Intermediates - Buddy D. Ratliff  
Business Manager - Nylon Intermediates - Edward K. Reiff  
Business Manager - Polyester Intermediates - John W. Mooney  
Business Development Manager - Harold Pollack  
Marketing Manager - James A. Sinex  
International Marketing Manager - Donald L. Kjelleren  
Account Executives - Donald Maxwell, Roger A. Brownback, William R. Hess, Gary J. Hilkert  
Manager - Materials Management - John R. Phillips  
Continuous Improvement Manager - Robert W. Gerlach  
Manager - Computer Technology - Steven T. Miller  
Director - Marketing Services - Alex S. Campbell  
Manager - Marketing Research - James R. Koterski  
Manager - Customer Service Center - Derek J. Lough  
Manager - Marketing Services - Frank E. Burgess  
Personnel Planning Specialist - Patricia A. Nichols  
Dev. and Tech. Service Manager - Chemicals - Stephen H. Korzeniewski  
Dev. and Tech. Service Manager - Coatings/Plastics - Max H. Lewis  
Dev. and Tech. Service Manager - Pulp and Paper - Robert A. Johns  
Technical Service Manager - Engineering and Product Safety - Carl H. Muendel  
Dev. and Tech. Service Manager - "Freon" Markets - Helen A. Connon  
Dev. and Tech. Service Manager - "Freon" Markets - Mark C. Hause  
Production Manager - Petrochemicals - Donald E. Heasley  
Technical Manager - Petrochemicals - Randolph J. Guschl  
Director - Petrochemicals - Europe - Kenneth W. Wall \*

Vice President and General Manager - Specialty Chemicals - Ned C. Jackson

Administrative Manager / M&L Manager - Maurice R. Snavely  
Director - Safety and Environmental Resources - Richard A. Romanelli  
Manager - Center for Excellence - Myron S. Galuskin  
Business Manager - Specialty Intermediates - Samir A. Hamdan  
Business Manager - Performance Chemicals, Additives and Antiknocks - John S. Thackrah  
Business Manager - "Terathane" Products - George F. MacCormack  
Production Manager - Specialty Chemicals - Daniel W. Burger, Jr.  
Technical Manager - Specialty Chemicals - Stanley S. Wreford  
Financial Manager - Specialty Chemicals - Randall P. Symes  
Director - Chemicals and Pigments - Europe, Middle East, Africa - Uwe Bohr \*

Vice President and General Manager - White Pigment and Mineral Products - Charles N. Masten

Planning Manager - James E. Pesek  
Director - TiO2 Operations - Dennis H. Reilley  
Business Manager - Ores, Minerals and Coproducts - William B. White  
National Sales Manager - White Pigment and Mineral Products - John D. Travis  
Regional Manager - Coatings/Plastics (East) - John P. Pritchard  
Regional Manager - Coatings/Plastics (Central) - T. Anderson Jones  
Market Manager - Coatings/Plastics (West) - Charles L. Board, Jr.  
Regional Manager - Pulp and Paper (East) - Jeffrey L. Keefer  
Regional Manager - Pulp and Paper (Central) - Craig F. Binetti  
Production Manager - White Pigment and Mineral Products - G. Emmett Lynskey  
Technical Manager - White Pigment and Mineral Products - A. Michael Doyle  
Financial Manager - White Pigment and Mineral Products - Terry R. Priebe  
Director - Chemicals - Asia/Pacific - David J. Pang \*

Director - Business Services / Comptroller - William C. Parnell

Administrative Manager - Kathy L. Plush  
Accounting and Management Reports Manager - Harold T. Ritter  
Computer and Systems Manager - Keith A. Robinson  
Financial Manager - "Freon" Products - G. Van Alles  
Financial Manager - Industrial Chemicals - Diana T. Smith  
Financial Manager - Specialty Chemicals - Randall P. Symes  
Financial Manager - White Pigment and Mineral Products - Terry R. Priebe  
Principal Consultant - Roger L. Cason

Director - Human Resources and Administration - William H. Reynolds

Human Resources Managers - Benjamin R. Bundens, Bernard M. Ravenna

**DU PONT LEADERSHIP**  
**BOARD OF DIRECTORS, COMMITTEES OF THE BOARD,**  
**OFFICE OF THE CHAIRMAN AND OPERATING GROUP**

E. I. DU PONT DE NEMOURS AND COMPANY  
 JANUARY 1, 1991

**OPERATING GROUP**

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 C. R. BRONFMAN  
 E. M. BRONFMAN  
 C. L. BROWN  
 L. C. DUEMLING  
 E. B. DU PONT  
 R. E. HECKERT  
 E. G. JEFFERSON  
 H. W. JOHNSON  
 E. L. KOLBER  
 M. P. MAC KIMM  
 D. R. MC KAY  
 C. S. NICANDROS  
 D. G. SACKS  
 H. R. SHARP, III  
 J. L. WEINBERG  
 R. W. ARRINGTON  
 SECRETARY OF THE COMPANY

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D. R. MC KAY, CHAIRMAN  
 A. F. BRIMMER  
 L. C. DUEMLING  
 E. B. DU PONT  
 M. P. MAC KIMM  
 D. G. SACKS  
 D. J. HELLMANN, SECRETARY

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 E. M. BRONFMAN  
 C. L. BROWN  
 R. E. HECKERT  
 E. A. BROWNING, SECRETARY

**FINANCE COMMITTEE**

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 C. R. BRONFMAN  
 E. M. BRONFMAN  
 C. L. BROWN  
 E. G. JEFFERSON  
 H. W. JOHNSON  
 E. S. WOOLARD, JR.  
 E. A. BROWNING, SECRETARY

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 CHAIRMAN - DU PONT  
 Continuous Improvement  
 Global Effectiveness Team

E. P. BLANCHARD, JR.\*  
 VICE CHAIRMAN - DU PONT  
 Science and Technology

C. S. NICANDROS\*  
 EXECUTIVE VICE PRESIDENT -  
 DU PONT  
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 Conoco Inc.  
 Europe, Middle East, Africa

E. A. BROWNING  
 Secretary to the Office of the Chairman  
 and Operating Group

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 SENIOR VICE PRESIDENT -  
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 SENIOR VICE PRESIDENT -  
 DU PONT FINANCE  
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 SENIOR VICE PRESIDENT -  
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 DU PONT FIBERS  
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 SENIOR VICE PRESIDENT -  
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 Executive Vice President - Conoco  
 Exploration and Production

H. C. SAGER  
 SENIOR VICE PRESIDENT -  
 DU PONT  
 Executive Vice President - Conoco  
 Exploration and Production

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 SENIOR VICE PRESIDENT -  
 DU PONT  
 President and Chief Executive Officer,  
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 Sporting Goods

J. F. SCHMUTZ  
 SENIOR VICE PRESIDENT AND  
 GENERAL COUNSEL  
 DU PONT LEGAL

A. W. DUNHAM  
 SENIOR VICE PRESIDENT -  
 DU PONT POLYMERS  
 Environment

R. V. D. LUFT  
 SENIOR VICE PRESIDENT -  
 DU PONT CHEMICALS  
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C. H. LEE  
 SENIOR VICE PRESIDENT -  
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W. E. TATUM  
 SENIOR VICE PRESIDENT -  
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 AND SERVICES

C. L. HENRY  
 SENIOR VICE PRESIDENT -  
 DU PONT ELECTRONICS  
 Asia Pacific

M. A. SUWYN  
 SENIOR VICE PRESIDENT -  
 DU PONT IMAGING SYSTEMS  
 DU PONT MEDICAL PRODUCTS  
 Marketing

M. B. EMERY  
 SENIOR VICE PRESIDENT -  
 DU PONT ENGINEERING

A. MAC LACHLAN  
 SENIOR VICE PRESIDENT -  
 DU PONT RESEARCH AND DEVELOPMENT  
 Du Pont Central Research and Development  
 Innovation

M. G. PITCHER  
 SENIOR VICE PRESIDENT -  
 DU PONT  
 Executive Vice President - Conoco  
 Exploration and Production  
 Innovation

J. R. MALLOY  
 SENIOR VICE PRESIDENT -  
 DU PONT EXTERNAL AFFAIRS

R. W. FASICK  
 SENIOR VICE PRESIDENT -  
 DU PONT AUTOMOTIVE PRODUCTS  
 South America/Mexico

J. E. NEWALL  
 SENIOR VICE PRESIDENT -  
 DU PONT AGRICULTURAL PRODUCTS  
 Chairman and Chief Executive Officer,  
 Du Pont Canada Inc.

\*Also a member of the Office of the Chairman

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

December 10, 1991

5 HSM J5

Mr. Norman D. Griffiths  
E.I. DuPont de Nemours and Company  
1007 Market Street Suite D-7007  
Wilmington DE 19898

Re: DuPont's Section 104(e) Response

Dear Mr. Griffiths:

DuPont's Section 104(e) response and accompanying material are appreciated.

Unfortunately, Paragraph 7 of the Instructions which accompanied the Information Request was apparently overlooked because it required the affidavit of Mr. Meyer to attest that a certain standard of due care had been exercised by him in preparing the answer but no such affidavit accompanied the response.

Since the instructions have not been complied with, the answer received must be considered unresponsive and overdue. Since this may have been a mere oversight, I will consider the response timely filed once I receive Mr. Meyer's affidavit if received during the course of this month. You are at liberty to substitute any one of the other three individuals identified on page one of your response in lieu of Mr. Meyers should you so desire.

Sincerely yours,

  
Joseph A. Malek



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: December 10, 1991

SUBJECT: E.I. DuPont 104(e) response

FROM: Joseph A. Malek, 5HMS  
FTS 353-2007

TO: Fred Micke, 5HS  
Steve Mendoza, ORC  
Jim Novak, 5 WCC  
Jim Filippine, 5WCC  
Bob Topla, 5WCC  
Dan Sparks, FWS  
Tom Marks, 5HSM

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Attached you will find DuPont's response to a CERCLA Section 104(e) Request for Information which accompanied a box full of Exhibits, Attachments and Appendices.

In keeping with the understanding of sharing information between the programs and in order to assist ascertaining any natural resource injuries at DuPont, you are welcome to examine the box's contents. I may be able to photocopy a small portion and mail it to you so please call me first if you desire to know the size of some particular portion of the attachments.

Additional questions will be asked DuPont in a supplemental 104(e) Information Request which will be sent to them on December 27, 1991. Should you desire to include one or more of your own questions or request for information, please let me know prior to that date.



LEGAL  
Wilmington, Delaware 19898

November 22, 1991

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Joseph A. Malek (5HSM-TUB-7)  
Superfund Program Management Branch  
U. S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, IL 60604

Re: "Du Pont - Malek"  
East Chicago, Indiana Plant Site

Dear Mr. Malek:

Attached is the response to the CERCLA §104(e) Request for Information received by the East Chicago Plant of E. I. du Pont de Nemours & Company ("Du Pont") on September 20, 1991. Thank you for granting the extension of time for our reply until November 25, 1991 (Ref. Griffiths to Malek, October 15, 1991).

In this response, there are four instances in which Du Pont requests answers be kept confidential: Attachment 2-2, Attachment 2-4, Attachment 8-1, and Attachment 9-5. This request is being made pursuant to 40 CFR §2 et seq. In each instance the request for treatment of confidential business information is clearly identified in the text of the response. Each of these attachments is preceded by a cover sheet identifying them as confidential business information and is in a sealed envelope.

Joseph A. Malek  
November 22, 1991  
Page 2

Please address all future correspondence on this matter to:

Norman D. Griffiths, Esq.  
E. I. du Pont de Nemours & Co.  
Legal Department, D-7007  
1007 Market Street  
Wilmington, DE 19898

(302) 774-5403  
(302) 774-1189 (fax)

Should you require any additional information or clarification of this response, please do not hesitate to contact me.

Very truly yours,



Norman D. Griffiths  
Counsel  
Environmental Law Group

Attachments

cc: Jodi Lynn Traub, Associate Director  
Waste Management Division (w/o attachments)  
Eugene F. Hartstein, Plant Manager  
Du Pont East Chicago Site



LEGAL  
Wilmington, Delaware 19898

RECEIVED  
OCT 23 1991

October 15, 1991 TECHNICAL SUPPORT  
SECTION

Certified Mail  
Return Receipt Requested

Mr. Joseph A. Malek  
Superfund Program Management Branch  
U. S. EPA - Region V - 5HSM-TUB-7  
230 South Dearborn Street  
Chicago, Ill 60604

Re: Request for Extension of Time - Du Pont Response  
CERCLA §104(e) Request - Du Pont East Chicago Facility

Dear Mr. Malek:

This letter is to confirm our telephone conversation today in which you agreed on behalf of the USEPA to grant Du Pont an extension of time to submit its responses to the above-referenced information request until Monday, November 25, 1991.

I would also like to express my thanks to you for your efforts in attempting to have the Agency approach the site in a unified manner. I think its in both our interests to do so.

Thank you for the courtesy in granting Du Pont's request for additional time. We're confident that we'll be in a position to submit our full response by the new deadline.

Very truly yours,

Norman D. Griffiths  
Counsel  
Environmental Law Group

**E. I. DU PONT DE NEMOURS & COMPANY**  
**RESPONSE TO THE REQUEST FOR INFORMATION**  
**EAST CHICAGO, INDIANA PLANT SITE**  
**"DU PONT - MALEK"**

In response to instruction paragraph #4, please be advised that the following personnel were consulted and assisted with the production of documents responsive to this request:

- a) O. Jerome Meyer, Environmental Coordinator  
Du Pont East Chicago Plant  
5215 Kennedy Avenue  
East Chicago, IN. 46312  
(219) 391-4653
- b) Pixie A. B. Newman, Engineering Consultant  
CH2M Hill  
1033 University Pl., Suite 300  
Evanston, IL 60201  
(708) 866-9490
- c) David E. Epps/Tobin Lounsbury  
Du Pont Environmental Remediation Services  
Bellevue, Building 300  
Carr Road  
Wilmington, DE 19802  
(302) 792-8984
- d) Norman D. Griffiths, Esq./Barbara U. Gravely  
E. I. du Pont de Nemours and Company  
Du Pont Legal, Suite D-7007  
1007 Market Street  
Wilmington, DE 19898  
(302) 774-5403

**SPECIAL NOTES:** Because the plant has generated a variety of products over the period of its operation and detailed records (and retirees) no longer exist for the late 1800's or the early part of this century, Du Pont cannot assure the Agency of the completeness of the information presented in this

response. Du Pont recognizes its continuing obligation to search for and produce responsive information if found.

Four of the attachments, 2-2, 2-4, 8-1, and 9-5, submitted to the Agency as part of our response contain information considered by Du Pont to be proprietary. We request that great care be taken to assure the confidentiality of this business information. In each instance the request is clearly identified in the text of the response. Each of the attachments is preceded by a cover sheet identifying them as confidential business information and is in a sealed envelope.

1. List the USEPA identification number or numbers ever issued to you and the corresponding units, facilities or vessels assigned these numbers.

The USEPA identification number issued to the East Chicago Plant is IND005174354.

2. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any materials at the Site or within 1.5 miles therefrom? If the answer to the preceding questions is anything but an unqualified "no", identify:
  - a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material,
  - b) the identity of the person or business which supplied you with such material,
  - c) how such materials were used, purchased, generated, stored, treated, transported, disposed or otherwise handled,
  - d) the dates that such materials were used, purchased, generated, stored, treated, transported, disposed or otherwise handled,
  - e) the place or location where such materials were used, purchased, generated, stored, treated, transported, disposed or otherwise handled, and
  - f) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed or otherwise handled.

Inorganic chemical manufacturing has occurred at the East Chicago Plant since 1892. Du Pont assumed operation of the plant in 1927.

Organic chemical manufacturing began in the mid-40s and ended in 1986.

2 a), c), d), e) Du Pont initiated an investigation of its East Chicago Plant in 1986. The purpose of the investigation, referred to as the Phase I Groundwater Assessment, was to determine, if possible, the potential past and present effects of waste and material handling and disposal practices upon the quality of groundwater beneath the plant site and to determine the need for further investigation. Potential source areas at the facility that could have affected or may be affecting the quality of groundwater at the facility were identified and ranked based on a prudent review of the existing facility and public information.

The study methodology consisted of a prudent record search, record logging, interviews with current and former employees, information compilation, data reduction, and a review of the material handling practices at the site over its operating life as a chemical manufacturing facility. The study was based solely on an evaluation of these sources and not on the collection of new analytical data.

The results of this study are presented in full in Attachment 2-1. Raw materials, products, by-products, support materials and production wastes were identified. Products and the periods during which they were produced are illustrated in Figure 3-2 and Appendix B of Attachment 2-1. Existing process flow sheets for materials manufactured at the facility were collected. If flow sheets were not available, an engineering analysis was made to develop probable chemical process flows, based on technology available at the time manufacturing began. See Appendices C and D. Possible waste streams for the various products, potential waste disposal practices including estimated locations, material storage, and loading and unloading practices were identified and characterized to the extent possible. This information can be found in Chapter 3: Tables 3-1, 3-2, 3-3, 3-4, 3-5 and 3-6; Figures 3-3, 3-4, 3-5, and 3-7 and Appendix E of Attachment 2-1.

Copies of the Du Pont Company Chemicals Inventory (CCI), Attachment 2-2, are also provided in response to Questions 2 a), c), d), and f). The information contained in Attachment 2-2 is proprietary. Consistent with 40 CFR §2 et seq., Du Pont is notifying the Agency that it considers and treats the information contained in Attachment 2-2 as a trade secret and requests that EPA refrain from disclosing said information to others.

Consistent with 40 CFR §2.203(b), Attachment 2-2 has a cover sheet identifying it as confidential business information.

- 2 b) A list of historic and current suppliers dating back to the facility's origin could not be accurately generated from plant records search or interviews. A current listing of vendors and their products is provided in Attachment 2-3.
  - 2f) As stated earlier, due to the lack of records covering the 100-year life of this plant, there is no way to accurately estimate the quantity of materials, used, purchased, generated, stored, treated, transported, disposed of or otherwise handled at this facility. However, a summary of material potentially disposed on-site is provided in Attachment 2-1, Table 3-1. A list of raw materials currently used and finished products currently manufactured at the plant is supplied as Attachment 2-4. The information contained in Attachment 2-4 is also proprietary. Consistent with 40 CFR §2 et seq., Du Pont is notifying the Agency that it considers and treats the information contained in Attachment 2-4 as a trade secret and requests that EPA refrain from disclosing said information to others. Consistent with 40 CFR §2.203(b), Attachment 2-4 has a cover sheet identifying it as confidential business information.
3. State the dates during which you owned, used, occupied, operated or leased the Site or any portions thereof and provide copies of all documents evidencing or relating to such ownership, operation, use, occupation or lease.

The Du Pont Company has operated the East Chicago facility since 1927. On October 31, 1936, the Grasselli Company formally deeded the property consisting of approximately 440 acres to Du Pont. The Du Pont Company deeded a parcel to the Chicago, South Shore, South Bend Railroad on May 29, 1942 and to the Indiana Toll Road Commission on March 12, 1956. Other transfers or easements of portions of the property are set forth in the legend of the official property map. The property map is Attachment 3-1 and the deeds are Attachment 3-2.

On March 16, 1970, Du Pont leased to Illiana Transit Warehouse Corporation of Hammond, Indiana 6 acres to be used for a warehouse. Conoco, Du Pont's energy subsidiary, established an oil distribution center from the early 80's until mid-1990. At that time, the building and property were transferred to Du Pont's Imaging Department for recycling activities.



On January 1, 1974, Purdue University leased 4 acres for use as an environmental study station for flora and fauna of the area. The study occurred in the summer of 1974. Du Pont does not have a copy of any documents that may have been generated as a result of the Purdue study.

4. Furnish all spotted or unspotted land surveys and preliminary or final real estate abstracts or reports of real estate title for the site or any portions thereof.

Du Pont is unsure of the meaning of "spotted" and "unspotted" surveys. See Attachments 3-1 and 3-2 for information regarding plant property boundaries.

5. Identify the prior owners, occupants, users, tenants or operators of the Site or any portions thereof. For each, further identify:
  - a. the dates of ownership, occupancy, use or operations
  - b. any record, report or other documentation indicative of such ownership, use, occupancy or operation
  - c. all evidence that a hazardous substance, pollutant, or contaminant, may have been released or threatened to be released at the Site or any portion thereof during the period that others owned, occupied, or used the Site or any portions thereof.

The immediate prior owner of the property was the Grasselli Chemical Company. The date of their initial ownership is 1892. The file search indicated that the Grasselli Chemical Company owned an inorganic chemical manufacturing facility at the East Chicago location from 1892 to 1936. Du Pont took title to the property in 1936. The file search did not produce information relating to the release of hazardous substances or pollutants during the period that Grasselli operated the facility. At the time Du Pont assumed responsibility for the plant operations, it was not customary for environmental audits to be conducted in the transfer of industrial property.

Du Pont's limited information on materials handling and management practices at the facility during Grasselli's operation are also included in the Phase I Report (see Attachment 2-1).

5 a), b) See Attachment 3-2 as Du Pont's response to these subparts.

- 5 c) The file search did not produce information regarding hazardous substances that may have been released during Grasselli's ownership/operation of this facility.
6. For each and every prior operator, further identify:
- a. the dates of operation,
  - b. the nature of prior operations at the Site,
  - c. all evidence that they controlled access to the Site, and,
  - d. all evidence that a hazardous substance, pollutant, or contaminant may have been released or threatened to be released at or from the Site, or any portions thereof, and/or its solid waste units during their period of operation.

See response to Question 5.

7. Provide copies of all local, state, and federal environmental permits ever granted for your facility or any part thereof.

The file search revealed the following environmental permits were issued to Du Pont for the East Chicago Plant and are submitted as the attachments indicated below:

Attachment 7-1	State of Indiana Discharge Permit (Pre-NPDES Permit)
Attachment 7-2	NPDES Permit
Attachment 7-3	Industrial Discharge Permit for Discharge to the East Chicago Sanitary District
Attachment 7-4	State of Indiana Air Discharge Permit
Attachment 7-5	City of East Chicago Air Discharge Permit
Attachment 7-6	State of Indiana Underground Storage Tank Registration.
Attachment 7-7	Army Corps of Engineers Permit for Dredging the Grand Calumet River
Attachment 7-8	City of East Chicago Open Burning Permit

At various times throughout Du Pont's operation of the facility certain "approvals" were provided by the State and local regulatory authorities

for specific activities. For example, Du Pont received approval to operate a landfill and also to transport waste material. We are not enclosing documents related to these events in response to this request for permits.

8. Commencing with the date that you first commenced any operation at the site, furnish a list of all manufacturing, fabricating or production by-products, sludge and waste produced during the operations of your facilities.

Du Pont has made a prudent search of its records and has compiled information regarding the by-products, sludges, and wastes generated over the 64-year period that it has operated the East Chicago Plant. This search and resulting information is found in Appendix C, D, and E of the Phase I Report (see Attachment 2-1). In addition, from the Du Pont Corporate Solid Waste Information System ("CSWIS"), enclosed is the information for the East Chicago Plant for the only years for which this information was collected, 1982, 1987, 1988, 1989, and 1990. The report for each of these years can be found in Attachment 8-1. The information contained in Attachment 8-1 is proprietary. Consistent with 40 CFR §2 et seq., Du Pont is notifying the Agency that it considers and treats the information contained in Attachment 8-1 as a trade secret and requests that EPA refrain from disclosing said information to others. Consistent with 40 CFR §2.203(b), Attachment 8-1 has a cover sheet identifying it as confidential business information.

9. In the event one or more by-products, sludge or waste are enumerated in response to the above request, then
  - a. Furnish the date or dates that such disposal commenced and ended,
  - b. Furnish the chemical composition of the by-product, sludge or waste.
  - c. Furnish the quantity both annually and totally so disposed,
  - d. Identify those that may have been moved or transported off-site, excluding the Grand Calumet River, and for each state the duration that they remained on-site before removal and the on-site location where they were placed.
  - e. Identify those that were not transported off-site or deposited within the Grand Calumet River and indicate the dates thereof, the quantity and chemical composition and either supply a map locating each and every on-site location for such

disposal or otherwise graphically represent such location.

- 9a) Waste generation date information is provided in Attachment 2-1, the Phase I Report, Appendices B and E. Sanitary and process wastes were generated on-site from plant startup and continue today. The file search indicated that sanitary wastes were discharged to the East Chicago Sanitary District beginning in the mid-forties.
- 9b) Attachment 2-1, Tables 3-7 through 3-15, lists the chemical composition of by-products, sludges, or wastes discharged to on-site disposal areas. Records for a typical chemical composition for permitted discharges to the river referred to as Discharge Monitoring Reports or DMRs are provided in Attachment 9-1; additional pre-NPDES discharges to the river are contained in Attachment 7-1. Records for a typical chemical composition for permitted discharges to the East Chicago Sanitary District are provided in Attachment 9-2.
- 9c) Annual estimates for each year of operation and the total quantities disposed of over those years could not be gleaned from review of Du Pont records. Table 3-1 in Attachment 2-1 provides an estimate of the quantities of by-products, sludges, or wastes disposed on-site over the 64 years of plant operation by Du Pont. Some annual estimates can be provided for recent years of operation. Sanitary discharges to the East Chicago Sanitary District have varied over time in proportion to the staff employed at the plant. Records for the year 1989 estimate the discharges to be 10 gpm or approximately 5,250,000 gallons per year (see Attachment 9-3). Discharges to the Grand Calumet River have varied considerably over time. Recent information (1989) is provided in Attachment 9-4.

Filter cake is generated by the operation of the Environmental Control Facility at the rate of approximately 50,000,000 pounds per year. This estimate is based on 1989 data. See Attachment 9-5. The information contained in Attachment 9-5 is proprietary. Consistent with 40 CFR §2 et seq., Du Pont is notifying the Agency that it considers and treats the information contained in Attachment 9-5 as a trade secret and requests that EPA refrain from disclosing said information to others. Consistent with 40 CFR §2.203(b), Attachment 9-5 has a cover sheet identifying it as confidential business information.

- 9d) The file search indicated that few wastes were disposed of off-site prior to 1975. After 1975, it became the plant's practice to send certain wastes off-site:

- Organic wastes (primarily toluene, hexazinone, and hexane)
- Spent solvents
- Transformer oil containing PCBs
- Asbestos
- Flue Dust (containing hexavalent chromium)
- Waste acids including sulfamic acid

See Attachment 9-6, Du Pont's Eckhardt Survey for this facility.

The file search did not produce any records regarding the time periods that by-products, wastes or sludges were stored on-site prior to off-site disposal. For information regarding temporary on-site storage areas, see Phase I Report (Attachment 2-1, Figure 3-3).

- 9e) For information on chemical by-products, sludges, or wastes disposed of on-site, see Figure 3-3 and Tables 3-1, 3-7 through 3-15 of the Phase I Report (Attachment 2-1). Figure 3-3 is a site map showing the approximate locations of all on-site disposal areas.

10. Were rinse waters ever used during any portion of your operation at the site?

Du Pont interprets this question to be seeking information about waters used to "rinse" or wash impurities from solid substances. Based on this understanding, Du Pont has identified two past practices that may be responsive to this question. See response to Question 11.

11. If the foregoing request is answered in the affirmative, then
- a. Identify the chemicals within the rinse waters which from time to time were produced by your facility,
  - b. Specify the location that the rinse waters were eventually discharged into or upon before receiving your National Pollution Discharge Elimination System Permit and the method of transportation used,

- c. Specify the method or process for disposing of the resulting sludge extracted from the rinse water.

**Re: Practice #1 -- Sulfamic Acid**

- 11a) "Rinse water" was used in the process that produced sulfamic acid. Sulfamic acid crystals were rinsed in the centrifuge. The chemical composition of the "rinse water" upon discharge (as described in 11b), was a weak sulfamic acid ( $\text{HOSO}_2\text{NH}_2$ ). See Attachment 2-1 for the years of this operation.
- 11b) The "rinse water" was discharged to the mother liquor tank and re-used and consumed in the process for making sulfamic acid. It was never the plant's practice to discharge the "rinse water" to the river or to the land.
- 11c) No sludge was generated during the process.

**Re: Practice #2 -- Colloidal Silica**

- 11a) Colloidal silica "rinse waters" contained colloidal silica and approximately 0.1%  $\text{H}_2\text{SO}_4$ .
- 11b) Attachment 2-1, Appendix C, Figure C-14 shows the "rinse waters" were neutralized and discharged via a pipeline to the river prior to 1972.
- 11c) No sludge was generated during the process.
12. List all the chemical products used at the facility during any and all portions of your operation thereof.
- Attachment 2-1, Chapter 3, Appendices C and D, and the CCI (Attachment 2-2) provides a summary of the chemical products used at the facility.
13. List all end-products produced, manufactured, fabricated or processed at the facility which were either produced which were intended for sale or for use by another division, operation, subsidiary or affiliate of your company.

Attachment 13-1 provides a summary of the products manufactured for sale or use by another division, operation, subsidiary or affiliate.

14. Furnish copies of all maps, drawings, aerial photographs, and still photographs in your possession which depict any portion of the site, its facilities or use which were made or taken within the last sixty years.

During the 64 years of Du Pont's operation of the facility, literally hundreds of "maps, drawings, aerial photographs, and still photographs" have been generated for the East Chicago Plant, including individual buildings and processes. These maps, drawings, etc. have little, if any, relevancy to the nature of materials used at the facility; the threatened or actual release of any hazardous materials, or Du Pont's financial capability to fund remediation efforts at the site. Although this request falls outside the scope of information required under CERCLA Section 104(e), Du Pont is providing:

- Attachment 14-1 - Aerial photograph of the facility at the time Du Pont began operating it in 1927
- Attachment 14-2 - Aerial photographs of the facility taken during various years of operation
- Attachment 14-3 - Aerial photograph of the facility taken in March, 1990

In addition, Attachments 2-1 and 3-1 contain several drawings and maps of the facility which show disposal sites and the approximate locations of various product lines.

15. List the dates, authors and any document reference number for all your engineering, manufacturing or production documents, reports, surveys, letters, memos and other record which contains therein the expression or words, "Grand Cal", "River", "wetland", or "Grand Calumet River" briefly describing the content in which those expressions appear in said documentation and identify the gist of the subject matter of the document.

Du Pont's response to this question assumes that the Agency, consistent with CERCLA Section 104(e), is interested in Du Pont records that relate to "releases" (as defined in the Request for Information) from Du Pont's East Chicago Plant to the Grand Calumet River or its wetlands. Consequently, we have not included periodicals, newspaper or other published articles about the Grand Calumet River that are contained in Du Pont files. Although we assume that the Solid Waste Division would have access to the Water Division's NPDES files for this facility, we are nevertheless providing some NPDES permit-related information in response to this question. See Attachment 9-1. We also would refer you to the permit for the Plant's discharges to the Grand

Calumet River (see Attachment 7-1). Over the years, routine Compliance Sampling Inspections were conducted by state regulatory officials. See Attachment 15-5. A Consent Order (Civil Action No. 71 H 53, dated November 14, 1972) was entered into between Du Pont and the United States. See Attachment 15-6. The Order expired upon the issuance of the site's NPDES permit in March, 1976.

Additional information responsive to this question may be found in the following attachments:

- Attachment 2-1 - Phase I Groundwater Assessment Report.  
Attachment 7-7 - Army Corps of Engineers Dredging Permit
- Attachment 15-1 - Phase II Final Report (1991)
- Attachment 15-2 - Goundwater Seep Information
- Attachment 15-3 - Wetlands Memo (1990)
- Attachment 15-4 - Miscellaneous information regarding the river.  
Attachment 15-5 - Compliance Sampling Inspections  
Attachment 15-6 - Consent Order

16. Has your facility ever received any written or verbal report, finding, document, letter or record describing the flora, fauna, biota, birds, mammals, fish or vegetation or, at, in or near the site?

Yes, Du Pont has received written reports describing plant and animal like at, in, or near the site. See response to Question 17.

17. If the answer to the foregoing request is affirmative, then furnish copies thereof and supply a substantially verbatim transcript of that which may have been verbally reported.

See Attachments 17-1 through 17-3. To the best of Du Pont's knowledge, no verbal reports have ever been received with regard to the foregoing.

- Attachment 17-1 - The Grand Calumet: Exploring the River's Potential
- Attachment 17-2 - Memo to Stevens from Plampin re native plants at the Site



SEP 13 1991

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

5 HSM TUB-7

Mr. E. F. Hartstein, Facility Manager  
E. I. DuPont Company  
5215 Kennedy Avenue  
East Chicago, Indiana 46312

Re: Request for Information Pursuant to § 104(e) of CERCLA  
and § 3007 of RCRA, for E.I. DuPont de Nemours and Co., Inc.

Dear Mr. Hartstein:

The United States Environmental Protection Agency (U.S. EPA) is currently investigating the source, extent and nature of the release or threatened release of hazardous substances, pollutants or contaminants on, at, or about the E.I. DuPont facility in East Chicago (hereinafter referred to as "the Site"). This investigation requires inquiry into the generation, storage, treatment and disposal of such substances that have been or threaten to be released at the Site. U.S. EPA is also investigating the ability of persons connected with the Site to pay for or perform a clean-up of the Site.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, and pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, you are hereby requested to respond to the Information Requests enclosed. Compliance with the enclosed Information Requests is mandatory. Failure to respond fully and truthfully to each and every Information Request within thirty (30) days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by U.S. EPA pursuant to Section 3008 of RCRA under which U.S. EPA may seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance, and/or pursuant to Section 104(e)(5) of CERCLA which, as amended, authorizes the United States to seek penalties from a Federal court of up to \$25,000 for each day of continued non-compliance.

"Non-compliance" is considered by U.S. EPA to be not only failure to respond to the Requests but also failure to respond completely and truthfully to each Request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties of up to ten thousand dollars (\$10,000) or up to five (5) years of imprisonment or both under 18 U.S.C. § 1001.

The United States Environmental Protection Agency has the authority to use the information requested herein in an administrative, civil or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may request, however, that such information be handled as confidential business information. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the U.S. EPA. Information claimed as confidential will be handled in accordance with the provisions of 40 C.F.R. Part 2.

Your response to this Information Request should be mailed to:

Joseph A. Malek  
Superfund Program Management Branch 5HSM-TUB-7  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

All questions should be directed to Mr. Malek who may be reached at (312-353-2007), except those which may be of a legal nature in which event please direct such inquiries to Mr. Stephen P. Mendoza, Associate Regional Counsel at (312) 886-6852.

Thank you for your cooperation in this matter.

Sincerely,

Jodi Lynn Traub, Associate Director  
Waste Management Division

CONCURRENCE REQUESTED August 21, 1991						
RESPONSIBLE PARTY SEARCH UNIT, TSS, SPMB, OSF						
AUTHOR	SECRETARY	UNIT CHIEF	SECTION CH	BRANCH CHIEF	RPM/WMD	ORC
JOE MALEK						

## INFORMATION REQUEST

### COMPLIANCE WITH THE FOLLOWING INSTRUCTIONS ARE MANDATORY

1. A separate written response must be made to each and every request or question contained in this Information Request. In the event one or more of the requests or questions are not applicable, or in the event that you have no information which is responsive to any request, simply respond to that request saying either "Not applicable" or "No Information".
2. Should you write to us, please identify all your correspondence and your Response to this request with the caption "DuPont-Malek" and precede each paragraph of your response with the same paragraph number as appears in the Request.
3. You are first required to conduct a reasonably prudent inquiry before furnishing information to this request which includes: interviewing all existing or former employees, managers or independent contractors who have or may have knowledge about any of the information sought herein, obtaining and examining copies of records and documents, diligently ascertaining facts or data, resolving discrepancies discovered during such tasks and undertaking other reasonable inquiries.
4. When answering this Information Request, you also will be required to furnish the name of each and every person who:
  - a. you consulted, conversed with or communicated with seeking information or assistance in responding to this request and
  - b. contributed information, data or records to you.
5. If information or documentation is not initially known on the date you submit your response but subsequently becomes available to you, or in the event that you later ascertain that your submitted response, or any portion hereof, is erroneous, incomplete or inadequate, within fourteen days thereafter you are obligated to furnish the appropriate response or supplement that which had been initially

furnished or to otherwise notify us thereof.

6. Should you furnish any document, report or record in complete or partial response to any request you must either thereon, or in some other reasonable manner, indicate the paragraph number within the Request to which the supplied documentation is applicable.
7. You must respond to this Information Requests on the basis of all information and documents in your possession, custody or control or which may be in the possession, custody or control of your former or current employees, agents, servants, contractors or attorneys. You are obliged to obtain and examine all such available documentation before responding regardless of source.
8. If you are aware that any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, in lieu of furnishing the documentation, identify the documents, the person to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.
9. Your response must conclude with your signed statement under oath substantially identical to the following:

I, after first being duly sworn on my oath, depose and state that after first conducting a reasonably prudent search as required by the Instructions which accompanied the Request for Information, I am responding to the Information Request to the best of my knowledge and belief by furnishing my answers found herein.

\_\_\_\_\_  
(Your signature)

\_\_\_\_\_  
(Home address, City, State and Zip)

\_\_\_\_\_  
Home and Business Phone Numbers

Subscribed to before me this \_\_\_ day of \_\_\_\_\_, 199\_\_

(SEAL)

\_\_\_\_\_  
Notary Signature

10. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36901 et seq. (September 1, 1976); 43 Federal Register 4000 et seq. (September 8, 1978); 50 Federal Register 51654 et seq. (December 18, 1985)]. If no such claim accompanies the information when it is received by the U.S. EPA, it may be made available to the public by the U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA.
11. U.S. EPA has the authority to use the information requested herein in an administrative civil or criminal action.

#### Definitions

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, partners, successors, assigns, subsidiaries and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity.
3. "The Site" or "the Facility" shall mean and include the property on or about 5215 Kennedy Avenue, East Chicago, Indiana that is bounded by Kennedy Avenue on the West and adjacent the Grand Calumet River.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances including petroleum products.
5. The term, "pollutant" or *What is DuPont SIC #?* same definition as that contain *What is its business?* LA, and includes any mixtures *①: 40 CFR 423 deals with the regulation of steam electric power generating plant source category. (ie applicable to persons primarily engaged in the generation of electricity for distribution and sale which results from a process (using) coal, oil or gas, or nuclear fuel with a thermal cycle using water as the thermodynamic cycle.)* 423.11
6. The term "hazardous waste" that contained in Section : n as
7. The term "solid waste" shall that contained in Section 1
8. The term "materials" shall : substances that have been generated, treated, stored, or disposed of or otherwise

handled at or transported to the Site, including but not limited to all hazardous substances, pollutants and contaminant, hazardous wastes, solid wastes, as defined above and any material discharged or deposited within the adjacent Grand Calumet River or its adjoining wetland.

9. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
10. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
11. The terms, "furnish", "describe", "identify" or "indicate", shall mean submitting to the U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, the above terms require you to provide a written response to the request. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.
12. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

13. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
14. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
15. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
16. "Transaction" or "Transact" means every separate act, deal, instance, occurrence, sale, transfer, giving, delivery, change in ownership, or change in possession.
17. As used herein, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record



book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, video tape or other type of memory) including

- (a) every copy of each document which is not an exact duplicate of a document which is produced,
- (b) every copy which has any writing, figure or notation, annotation or the like of it,
- (c) drafts,
- (d) attachments or enclosures with any document and
- (e) every document referred to in any other document.

18. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these information requests any information

which might otherwise be construed to be outside their scope.

19. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
20. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Part 260-280, in which case the statutory or regulatory definitions shall apply.
21. "Sludge" means the solids which remain suspended in wastewater.

#### REQUESTS FOR INFORMATION

1. List the USEPA identification number or numbers ever issued to you and the corresponding units, facilities or vessels assigned these numbers.
2. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any materials at the Site or within 1.5 miles therefrom? If the answer to the preceding questions is anything but an unqualified "no", identify:
  - a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material,
  - b) the identity of the person or business which supplied you with such material,
  - c) how such materials were used, purchased,

generated, stored, treated, transported, disposed or otherwise handled,

- d) the dates that such materials were used, purchased, generated, stored, treated, transported, disposed or otherwise handled,
- e) the place or location where such materials were used, purchased, generated, stored, treated, transported, disposed, disposed or otherwise handled, and
- f) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed or otherwise handled.

- 3. State the dates during which you owned, used, occupied, operated or leased the Site or any portions thereof and provide copies of all documents evidencing or relating to such ownership, operation, use, occupation or lease
- 4. Furnish all spotted or unspotted land surveys and preliminary or final real estate abstracts or reports of real estate title for the site or any portions thereof.
- 5. Identify the prior owners, occupants, users, tenants or operators of the Site or any portions thereof. For each, further identify:
  - a. the dates of ownership, occupancy, use or operations
  - b. any record, report or other documentation indicative of such ownership, use, occupancy

or operation.

- c. all evidence that a hazardous substance, pollutant, or contaminant, may have been released or threatened to be released at the Site or any portion thereof during the period that others owned, occupied, or used the Site or any portions thereof.

6. For each and every prior operator, further identify:

- a. the dates of operation,
- b. the nature of prior operations at the Site,
- c. all evidence that they controlled access to the Site, and
- d. all evidence that a hazardous substance, pollutant, or contaminant may have been released or threatened to be released at or from the Site, or any portions thereof, and/or its solid waste units during their period of operation.

7. Provide copies of all local, state, and federal environmental permits ever granted for your facility or any part thereof.

8. Commencing with the date that you first commenced any operation at the site, furnish a list of all manufacturing, fabricating or production by-products, sludge and waste produced during the operations of your facilities.

9. In the event one or more by-products, sludge or waste are

enumerated in response to the above request, then

- a. Furnish the date or dates that such disposal commenced and ended,
- b. Furnish the chemical composition of the by-product, sludge or waste
- c. Furnish the quantify both annually and totally so disposed,
- d. Identify those that may have been moved or transported off-site,, excluding the Grand Calumet River, and for each state the duration that they remained on-site before removal and the on-site location where they were placed.
- e. Identify those that were not transported off-site or deposited within the Grand Calumet River and indicate the dates thereof, the quantity and chemical composition and either supply a map locating each an every on-site location for such disposal or otherwise graphically represent such location.

10. Where rinse waters ever used during any portion of your operation at the site?

11. If the foregoing request is answered in the affirmative, then

- a. Identify the chemicals within the rinse waters which from time to time were produced

by your facility,

- b. Specify the location that the rinse waters were eventually discharged into or upon before receiving your National Pollution Discharge Elimination System Permit and the method of transportation used,
- c. Specify the method or process for disposing of the resulting sludge extracted from the rinse water.

- 12. List all the chemical products used at the facility during any and all portions of your operation thereof.
- 13. List all end-products produced, manufactured, fabricated or processed at the facility which were either produced which were intended for sale or for use by another division, operation, subsidiary or affiliate of your company.
- 14. Furnish copies of all maps, drawings, aerial photographs, and still photographs in your possession which depict any portion of the site, its facilities or use which were made or taken within the last sixty years.
- 15. List the dates, authors and any document reference number for all your engineering, manufacturing or production documents, reports, surveys, letters, memos or other record which contains therein the expression or words, "Grand Cal", "River", "wetland", or "Grand Calumet River" briefly describing the content in which those expressions appear in said documentation and identify the gist of the subject

matter of the document.

16. Has your facility ever received any written or verbal report, finding, document, letter or record describing the flora, fauna, biota, birds, mammals, fish or vegetation or, at, in or near the site?
  17. If the answer to the foregoing request is affirmative, than furnish copies thereof and supply a substantially verbatim transcript of that which may have been verbally reported.
-

RECEIVED

19 1991

U.S. DEPARTMENT OF JUSTICE  
OFFICE OF REGIONAL COUNSEL





LEGAL  
Wilmington, Delaware 19898

March 26, 1991

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Joseph A. Malek (5 HMS TUB-7)  
U.S. EPA Region V  
Superfund Branch  
230 South Dearborn Street  
Chicago, Ill 60604

Re: Du Pont East Chicago Plant

Dear Mr. Malek:

We appreciate the time you have taken during two recent telephone calls with representatives of Du Pont to explain your section's interest in the above-referenced facility. The purpose of this letter is to try and set a course for a meaningful and open dialogue and information exchange to address the issues facing the site.

As you are aware, the Water Division of Region V served Du Pont with a "Request for Information" under §308 of the Clean Water Act. Our responses were provided on March 14, 1991. The formulation of responses to the several questions consumed several resources and man-hours. We recognize the statutory authority of the Water Division to seek information about potential and actual sources of pollution to surface waters and Du Pont's obligation under the law to provide them with such information.

We are now faced with yet another information request from your office on behalf of the Superfund Branch of Region V. While we do not question the Superfund Branch's authority under the Comprehensive Environmental Response Compensation and Liability Act ("CERCLA"), among other laws, to request information concerning the actual or threatened release of hazardous substances from a facility, we believe that a unified approach by your section along with the Water Division to the environmental issues at the site would be more cost effective for both of us. You are correct in stating that the information you are requesting is different from that sought by the Water Division. However, the groundwater seep that is the subject of the Water Division's investigation is a surface expression of groundwater which will be addressed in the overall site remediation plan.

With regard to the items of information requested in your letter to Mr. Meyer, we are including with this letter, copies of: (i) a site map which shows the plant boundaries along with conveyances of title to this facility; (ii) a copy of Du Pont's 1990 annual report that lists the internal organization of the Company. Du Pont's East Chicago Plant is part of the "Du Pont Chemicals" function; and (iii) a copy of the Spill Control and Reporting Section of the East Chicago Site Emergency Response Plan with respect to your request for "...procedures, policies for responding to the release of toxic substances...".

After careful consideration, we have decided to decline your request for a copy of a Du Pont telephone directory. We take this position because a Du Pont telephone directory is not relevant to any of the types of information identified in CERCLA §104(e)(2) that the Agency may seek regarding: (A) the nature of materials generated, treated, stored, or disposed of at the facility; (B) the nature of a release of hazardous substances or pollutants from the facility; or (C) Du Pont's ability to pay for, or perform a cleanup at the facility.

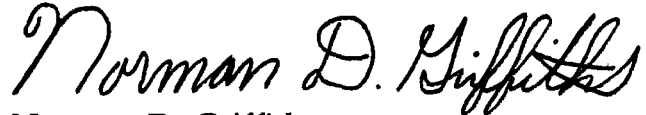
Although Du Pont is very interested in maintaining and enhancing its cooperative, working relationship with Region V in addressing the various environmental issues at this facility, the potential of litigation is always present. Because of that potential, we would ask that members of your office wishing to meet or interview Du Pont employees notify either the Plant Manager, Gene Hartstein or my office prior to making any such contact. We will consider all such requests carefully and, if appropriate, arrange for such meetings/interviews. I am representing to you herein that we will cooperate to the extent practicable to identify knowledgeable individuals and make said individuals available.

We disagree with your assertion that my role in providing legal counsel to Du Pont employees is limited to "management" and not lower level employees. However, there may be instances in which we would cooperate without counsel being present in the development of information about the site. Such cooperation, of course, will be based on an assumption that the Agency is attempting to gain a fuller understanding of the site's history for purposes of working together to address the issues, not to build a case of liability against us.

We will be attempting to schedule a meeting with the Water Division for April 15, 1991 to go over our site investigation work-to-date and to resolve a "path forward" on the groundwater seep and discuss the ongoing activities related to the overall Site Plan.

Let me assure you that Du Pont takes its environmental responsibilities very seriously and is moving expeditiously (and voluntarily) to gather sufficient data for an assessment of site conditions. We would welcome your attendance at any meetings to further this goal.

Very truly yours,



Norman D. Griffiths  
Counsel  
Environmental Law Group

cc: J. Traub, Acting Chief, Superfund Program (5 HSM-TUB-7) (w/o encl.)  
D. S. Bryson, Director, Water Division, Region V (5WCC-TUB-8)  
Skipp Bunner, IDEM  
E. F. Hartstein, Manager, East Chicago Plant

Attachments  
Est.Chcgo./8.

bcc: N. Bell, CHEM, B-12252A (w/o encl.)  
H. Frey, CHEM, BOD -918-13 (w/o encl.)  
D. H. Heck, ENGR, L33E45 (w/o encl.)  
S. Cline, DERS, Bellevue Park Bldg. 300 (w/o encl.)



LEGAL  
Wilmington, Delaware 19898

March 26, 1991

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RECEIVED  
APR 01 1991  
TECHNICAL SUPPORT  
SECTION

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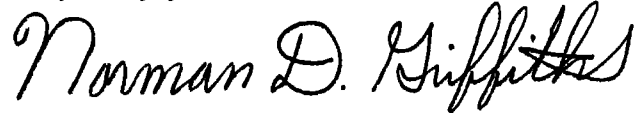
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Very truly yours,



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Counsel  
Environmental Law Group

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D. S. Bryson, Director, Water Division, Region V (w/o encl.)  
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E. F. Hartstein, Manager, East Chicago Plant

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S. Cline, DERS, Bellevue Park Bldg. 300 (w/o encl.)

RECALLED ATTACHMENT 2-2

no longer carried CBI

as per P2, p. 3 ..t

undated 7 page letter

to Kurt Lindlund, EPA,

from Norman Griffiths,

Dept. (CBI File)

ATTACHMENT 2-2

ORIG

2-2